

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas



Harvey Davis
Executive Director

November 22, 1982

TEXAS WATER COMMISSION
Lee B. M. Biggart, Chairman
Felix McDonald
John D. Stover

Ms. Karen Shewbart
Dow Chemical Co. USA
P. O. Box Drawer K, B-2616
Freeport, Texas 77541

RECEIVED

DEC 21 1982

U.S. DWR

Dear Ms. Shewbart:

Re: Dow Chemical Company USA, Freeport Division, ISW Registration No. 30106

On September 15, 17 and 20, 1982, an industrial solid waste compliance inspection was conducted at your facility by Gail Corrigan of this Department. The following deficiencies were noted:

1. Notification of waste streams is not current as required by Texas Administrative Code (TAC) Section 335.6.
2. Notification of waste management methods is not current as required by TAC Section 335.6.
3. Inspection schedules and inspection logs are not adequate in all units of the facility as required by TAC Section 335.116.
4. Documents and records of personnel training are not adequate as required by TAC Section 335.117(d).
5. Closure plans in all units of the facility are not adequate as required by TAC Sections 335.211-.216.
6. Incinerators are not all managed in accordance with TAC Section 335.364.

REPLY TO: DISTRICT 7 / 4301 CENTER STREET / DEER PARK, TEXAS 77536 / AREA CODE 713/479-5981

P. O. Box 13087 Central Station • Austin, Texas 78711 • 512/479-5981